

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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Index No.:
Date Purchased: March 1, 2022
SUMMONS

JENNIFER PRATTS,

Plaintiff(s),

-against-

ELMUSTAFA TARIG MOHAMED,
RED SEA TRUCKING LLC, AND
ARWA TRANS, LLC,Plaintiff designates Bronx
County as the place of trial.The basis of venue is:
PLAINTIFF'S RESIDENCEPlaintiff resides at:
2010 Bruckner Boulevard #9F
Bronx, NY 10473

County of Bronx

Defendant(s).

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To the above named Defendant:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with the summons, to serve a notice of appearance on the Plaintiffs' Attorney within twenty (20) days after the service of this supplemental summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: Brooklyn, New York
March 1, 2022

ERIK IKHILOV, ESQ.
Ikhilov & Associates
Attorneys for Plaintiff(s)
JENNIFER PRATTS
2357 Coney Island Avenue
Brooklyn, New York 11223
718-336-4999

Defendant(s) address:

Jennifer Pratts
2010 Bruckner Boulevard, Apt. 9F
Bronx, New York 10473

Elmustafa Tarig Mohamed
4191 N. Haverhill Road, Apt. 413
West Palm Beach, FL 33417

Red Sea Trucking LLC
1100A North Stiles Street
Linden, New Jersey 07036

Arwa Trans, LLC
10234 Liberty Road
Randallstown, MD 21133

NOTE: The law provides that

- (a) if this summons is served by its delivery to you personally within the City of New York, you must appear and answer within **TWENTY** days after such service; or
- (b) If this Summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication or by any means other than personal delivery to you within the City of New York, you are allowed **THIRTY** days after proof of service thereof is filed with the Clerk of this Court within which to appear and answer.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX-----X
JENNIFER PRATTS,Index No.:
Date Purchased: March 1, 2022**VERIFIED COMPLAINT**

Plaintiff(s),

-against-

MOHAMED TARIG ELMUSTAFA,
RED SEA TRUCKING LLC, AND
ARWA TRANS, LLC,

Defendant(s).

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Plaintiff JENNIFER PRATTS by her attorneys, IKHILOV & ASSOCIATES, as and for his Verified Complaint against the defendants ELMUSTAFA TARIG MOHAMED, RED SEA TRUCKING LLC and ARWA TRANS, LLC, respectfully alleges, upon information and belief as follows:

1. That in all times hereinafter alleged, JENNIFER PRATTS, was and still is a resident of County of Bronx, in the State of New York, and as such, she is the subject to the jurisdiction of this Honorable Court.
2. That in all times hereinafter mentioned defendant ELMUSTAFA TARIG MOHAMED was, and still is, a resident of Palm Beach County, State of New Florida.
3. That in all times hereinafter mentioned, defendant RED SEA TRUCKING LLC was, and still is a foreign limited liability company, duly organized and existing by virtue of and under the laws of the State of New Jersey.
4. That in all times hereinafter mentioned, defendant RED SEA TRUCKING LLC was and still is a foreign limited liability company duly licensed and authorized to do business in the State of New Jersey.
5. That in all times hereinafter mentioned RED SEA TRUCKING LLC did conduct and carry

on business in the State of New York.

6. That in all times hereinafter mentioned RED SEA TRUCKING LLC was and still is a corporation doing business in the State of New York.
7. That in all times hereinafter mentioned RED SEA TRUCKING LLC was and still is a partnership doing business in the State of New York.
8. That in all times hereinafter mentioned RED SEA TRUCKING LLC was and still is a limited liability partnership doing business in the State of New York.
9. That in all times hereinafter mentioned RED SEA TRUCKING LLC was and still is a sole proprietorship doing business in the State of New York.
10. That in all times hereinafter mentioned RED SEA TRUCKING LLC transacted business within the State of New York.
11. That in all times hereinafter mentioned RED SEA TRUCKING LLC derived substantial revenue from goods used or consumed or services rendered in the State of New York.
12. That in all times hereinafter mentioned RED SEA TRUCKING LLC derived substantial revenue from interstate or international commerce.
13. That in all times hereinafter mentioned, defendant ARWA TRANS, LLC was, and still is a foreign limited liability company, duly organized and existing by virtue of and under the laws of the State of Maryland.
14. That in all times hereinafter mentioned, defendant ARWA TRANS, LLC was and still is a foreign limited liability company duly licensed and authorized to do business in the State of New York.
15. That in all times hereinafter mentioned ARWA TRANS, LLC did conduct and carry on business in the State of New York.
16. That in all times hereinafter mentioned ARWA TRANS, LLC was and still is a partnership doing business in the State of New York.
17. That in all times hereinafter mentioned ARWA TRANS, LLC was and still is a partnership doing business in the State of New York.
18. That in all times hereinafter mentioned ARWA TRANS, LLC was and still is a limited liability partnership doing business in the State of New York.
19. That in all times hereinafter mentioned ARWA TRANS, LLC was and still is a sole proprietorship doing business in the State of New York.

20. That in all times hereinafter mentioned ARWA TRANS, LLC transacted business within the State of New York.
21. That in all times hereinafter mentioned ARWA TRANS, LLC derived substantial revenue from goods used or consumed or services rendered in the State of New York.
22. That in all times hereinafter mentioned ARWA TRANS, LLC derived substantial revenue from interstate or international commerce.
23. That on or about October 29, 2021 JENNIFER PRATTS was the lawful operator and owner of a 2021 BMW motor vehicle bearing New Jersey registration number J38NVN.
24. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED was in physical control and/or operation of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K with the knowledge consent and permission of the owner of such.
25. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED was operating the aforesaid motor vehicle bearing New Jersey registration numbers TYU428 and AW289K, with the express and/or implied authority, consent, and permission and or/ratification, and/or within the scope of his duties and responsibilities as an agent, servant and or/employee of RED SEA TRUCKING LLC.
26. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED was operating the aforesaid motor vehicle bearing New Jersey registration numbers TYU428 and AW289K, with the express and/or implied authority, consent, and permission and or/ratification, and/or within the scope of his duties and responsibilities as an agent, servant and or/employee of ARWA TRANS, LLC.
27. That on or about October 29, 2021 defendant RED SEA TRUCKING LLC was a registered owner of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
28. That on or about October 29, 2021 defendant RED SEA TRUCKING LLC was a titled owner of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
29. That on or about October 29, 2021 defendant RED SEA TRUCKING LLC was a lessor of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
30. That on or about October 29, 2021 defendant RED SEA TRUCKING LLC was a lessee of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
31. That on or about October 29, 2021 defendant RED SEA TRUCKING LLC did maintain a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
32. That on or about October 29, 2021 defendant ARWA TRANS, LLC was a registered owner

of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.

33. That on or about October 29, 2021 defendant ARWA TRANS, LLC was a titled owner of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
34. That on or about October 29, 2021 defendant ARWA TRANS, LLC was a lessor of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
35. That on or about October 29, 2021 defendant ARWA TRANS, LLC was a lessee of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
36. That on or about October 29, 2021 defendant ARWA TRANS, LLC did maintain a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
37. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED was a registered owner of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
38. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED was a titled owner of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
39. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED was a lessor of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
40. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED was a lessee of a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
41. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED did control a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
42. That on or about October 29, 2021 defendant ELMUSTAFA TARIG MOHAMED did maintain a motor vehicle bearing New Jersey registration numbers TYU428 and AW289K.
43. Those in all times hereinafter mentioned, Morris Avenue is and still a public streets and/or thoroughfares in the county of Bronx, City and State of New York.
44. That on or about October 29, 2021, the aforesaid 2021 BMW motor vehicle bearing New Jersey registration number J48NVN operated by Plaintiff JENNIFER PRATTS was struck, collided into, had an accident with, the aforesaid motor vehicle owned by RED SEA TRUCKING LLC and ARWA TRANS, LLC and operated by ELMUSTAFA TARIG MOHAMED.
45. That the aforesaid collision and accident was the result of negligence, carelessness and recklessness of the defendant, as follows: that the defendant were negligent, careless and

reckless in the ownership, operation, maintenance, inspection, repair, custody and control of their motor vehicle; that defendant's motor vehicle was operated at an excessive rate of speed; the defendant operated their motor vehicles in an improper and negligent manner given the attendant circumstance, and in violation of applicable laws, rules, regulations, and/or ordinances; that non-use and/or improper use was made of the horn, signals, steering and braking mechanisms to defendant's motor vehicle; that the operators of defendant's motor vehicle failed to yield the right of way, warn, pay heed and attention to existing traffic and roadway conditions, signals and devices, and failed to operate his motor vehicle in a reasonable safe manner and distance under the attendant circumstance, and failed to avoid the happening of the subject accident; that the operators of defendants' motor vehicles failed to act as a reasonable safe and prudent driver, so as to cause and/or contribute to the happening of the subject accident; that the defendant improperly, unreasonably, negligently, carelessly and recklessly operated his motor vehicles so as to wrongfully enter the subject accident; and that the defendants were otherwise careless, reckless and negligent.

46. JENNIFER PRATTS was free from contributing and/or comparative negligence in the happening of the subject occurrence.
47. That as a result of this occurrence, plaintiff sustained serious and severe personal injuries and nervous shock, was rendered sick, sore, lame and disabled, and has remained so since this occurrence, has required medical treatment, will upon information and belief require additional care and treatment in the future, and upon information and belief sustained economic and/or property damages.
48. That JENNIFER PRATTS is a covered person, and has sustained a "serious injury", within the meaning of Section 5102 of the Insurance Law of the State of New York.
49. That one or more exceptions to the limited joint and several liability provisions set forth in Article 16 of the CPLR apply.
50. JENNIFER PRATTS, therefore, seeks monetary damages for this cause of action in excess of the jurisdictional limits of all lower Courts, the specific sum of which to be determined by the trier of fact and law.

WHEREFORE, Plaintiff requests judgment against the Defendants, jointly and severally, in a sum exceeding the jurisdiction of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Brooklyn, New York
March 1, 2022

Yours, etc.


ERIK IKHILOV
Ikhilov & Associates
Attorneys for Plaintiff(s)
JENNIFER PRATTS
2357 Coney Island Avenue
Brooklyn, New York 11223
718-336-4999

ATTORNEY VERIFICATION

STATE OF NEW YORK)
)
) s.s.:
COUNTY OF KINGS)

I, ERIK IKHILOV, being duly sworn, depose and say:

I, the undersigned, an attorney admitted to practice in the Courts of New York State, state that I am the attorney of record for the Plaintiff in the within action; I have read the foregoing pleading; the same is true of my own knowledge, except as to the matters therein alleged to be on information and belief, and as to those matters I believe it to be true.

Dated: Brooklyn, New York
 March 1, 2022

ERIK IKHILOV, ESQ.
